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**SCHIAN WALKER, P.L.C.**

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Counsel for Dale Schian, Creditor Trustee of the PRM  
Family Holding Company, L.L.C. Creditor Trust

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF ARIZONA**

In re:

PRM FAMILY HOLDING COMPANY, L.L.C., *et al.*,  
  
Debtors.

Chapter 11

Case No. 2:13-bk-09026-BKM

(Jointly Administered)

DALE SCHIAN, CREDITOR TRUSTEE OF THE  
PRM FAMILY HOLDING COMPANY, L.L.C.  
CREDITOR TRUST,

Plaintiff,

Adv. Pro. No. 2:15-ap-00434-BKM

v.

TRADICIONAL IMPORTS,

**APPLICATION FOR WRIT OF  
GARNISHMENT**

Defendant,

(Non-Earnings)

BANK OF AMERICA, N.A.,

Garnishee.

This Filing Applies to:

☐ All Debtors

☒ Specified Debtors

1 Dale Schian (the "*Plaintiff*"), not individually but solely as Creditor Trustee of the PRM Family  
2 Holding Company, L.L.C. Creditor Trust (the "*Creditor Trust*"), by and through his undersigned  
3 counsel, hereby submits, pursuant to Federal Rule of Civil Procedure 69 and A.R.S. § 12-1572, this  
4 Application for Writ of Garnishment. In support hereof, Plaintiff respectfully states as follows:

5 1. On May 28, 2015, Plaintiff filed an adversary complaint against Defendant, Tradicional  
6 Imports (the "*Defendant*"), thereby initiating the above-captioned adversary proceeding. [ECF No. 1].

7 2. On December 11, 2015, this Court entered, pursuant to Fed. R. Civ. P. 55(b)(1), a Default  
8 Judgment (the "*Judgment*") in favor of Plaintiff and against Defendant in the amount of \$13,736.15, plus  
9 post-judgment interest and allowable costs. [ECF No. 20]. A true and correct copy of the Judgment is  
10 attached hereto as Exhibit A. Pursuant to 28 U.S.C. § 1961, post-judgment interest on the Judgment  
11 accrues at the rate of 0.54% per annum, compounded annually.

12 3. Plaintiff is a judgment creditor of Defendant by virtue of the Judgment, which remains  
13 outstanding.

14 4. As of March 18, 2016, the outstanding principal balance of the Judgment is \$13,736.15,  
15 plus accrued post-judgment interest in the amount of \$19.31, for a total outstanding balance of  
16 \$13,755.46. The cost of serving the Writ of Garnishment will be as shown on the Affidavit of Service  
17 and may be added to the Judgment along with allowable costs. Interest continues to accrue on the  
18 Judgment at the rate of 0.54% per annum, compounded annually.

19 5. Plaintiff has good reason to believe that Garnishee, Bank of America, N.A. (the  
20 "*Garnishee*") is holding nonexempt monies on behalf of the Defendant, or that Garnishee has in its  
21 possession nonexempt personal property belonging to the Defendant.

22 6. The name and address of Garnishee is:

23 Bank of America, N.A.  
24 201 E. Washington St.  
25 Phoenix, AZ 85004  
26

1           7.     I have attached a completed Writ of Garnishment and Summons form as Exhibit B, and  
2 therefore ask that the Writ be issued.

3                   DATED March 18, 2016.

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5                                   FREEBORN & PETERS LLP

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7                                   By: /s/ Elizabeth L. Janczak  
8   Devon J. Eggert  
9   Elizabeth L. Janczak

10   *Counsel for the Creditor Trustee*  
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